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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

International Monetary, a California
corporation,

Plaintiff,

vs.

Global Tech Industries Group, Inc. A
Nevada Corporation,; **Liberty Stock**
Transfer Inc, a New Jersey
corporations; DOES I through X,
inclusive; and ROE Corporations I
through X, inclusive,

Defendants

CASE #: _____

**Remand from State Court,
in accordance with 28 USC §1446,
and
Temporary Restraining Order Under
FRCP Rule 65(b)**

Defendant Global Tech Industries Group, Inc., by and through its attorney of
record, Warren R. Markowitz, Esq, does hereby move this court for the following
relief:

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**1. REMOVAL OF MATTER FROM STATE TO FEDERAL
COURT,**

In accordance with 28 USC §1446, Defendant Global Tech Industries Group, Inc., requests that this matter presently in Nevada State Court, Case # A-21-841175-B, be removed from State Court to Federal Court.

This request for removal is timely filed, as the summons and complaint were served on the movant, Global Tech Industries Group, Inc or about September 21, 2021, and is therefore within the 30 day window under the applicable rule.

Jurisdiction is proper in this matter as the issues in dispute may be brought, in accordance with the underlying contract within any court in the state of Nevada.

Diversity jurisdiction of the parties is complete under 28 USC §1332 as all known parties, Defendants and Plaintiff, are citizens of different states; and the amount in controversy not including costs and fees is greater than Seventy-Five Thousand Dollars (\$75,000)

Federal queastion may also be applied as the subject matter of the underlying dispute is that of the securities of GTII a publicly traded company traded on the OTC Marketplace; and involves matters relating to commerce.

Therefore GTII requests that this court remove the matter from state court and allow for it to move forward in Federal Court.

2. Temporary Restraining Order, under FRCP Rule 65(b)

Defendant GTII requests that this court issue a temporary restraining order on the following grounds;

1. The underling matter between the parties involves six million (6,000,000) common stock shares of the Defendant, that should they be liquidated shall negatively impact the overall market value, of GTII and the related impact on its shareholders.
2. That there exists a legitimate dispute between the parties, involving the underlying facts that led to the issuance of the share to the Plaintiff from the Defendant,
3. That should the Plaintiff be allowed to remove the legend on the restricted shares that are the subject of this Order, the Defendant shall have no way of recovering the approximate nine million dollars (\$9,000,000.00) that the Plaintiff will likely profit after failing to fulfill its obligations under the disputed contract.
4. The Temporary restraining order will allow the Defendant to respond to the complaint filed by the Plaintiff and to exercise its rights under the contract.
5. GTII is not in breach or violation of the underlying agreement as its time for performance has not yet lapsed as defined under

1 Section 5A(1) of the contract which states "... to provide legal
2 opinion of counsel and clear certificates under SEC Rule 144 no
3 sooner that six (6) months and no later that twelve (12) months
4 from the effective date specified on Agreement for each certificate.
5 These dates are 06/1/2021 and 12/1/2021 respectively. Making the
6 existing action by the Plaintiff untimely.
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9 Therefore, GTII requests that this court issue an order restraining the
10 Plaintiff from taking actions to remove the restrictive legend on the certificates
11 before the resolution of the dispute filed by the Plaintiff that is subject to the
12 removal request above or until after such time that GTII's time of performance has
13 expired.
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17 Submitted this Date September 30. 2021

18 /s/ Warren R. Markowitz, Esq
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25 on behalf of Defendant Global Tech Industries, Inc.
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27
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